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March 31, 2000

Lt. Colonel William Bulen, District Engineer
Walla Walla District Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876

Attention: Lower Snake River Study

Dear Lt. Col. Bulen,

This is a comment letter on the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement. The comments are submitted on behalf of the Washington Public Ports Association, which represents the 67 public port districts of Washington State. Washington's port districts are units of local government controlled by locally elected commissioners. They operate marine terminals, airports, marinas and industrial facilities throughout the State of Washington, including the entire length of the Washington run of the Snake River.

The Draft document describes four alternatives for improving the survival rates of adult and juvenile salmon as they pass through the four Lower Snake River dams. This discussion is part of a larger regional discussion relating to salmon survival and recovery. Citizens and interest groups do not seem to agree on any aspects of this debate, except that our runs of salmon have been in decline for many decades, and many factors are to blame. These factors have been categorized into the now familiar "four H's". In addition to these factors, ocean conditions and predation also play a major role in salmon mortality.

This draft document is narrowly focused on the Snake River dams. These dams have already benefited from a large amount of investment to decrease fish mortality, including bypass collectors, behavioral guidance structures, turbine improvements and spillway flow deflectors. These investments have been successful in a dam-by-dam sense, because the vast majority of fish that encounter a Snake River dam pass successfully through it. This report does a thorough job of presenting that information.

The Pacific Northwest region is now asking whether we can further modify these dams in an economically, scientifically and legally defensible way in order to create a marginal benefit to migrating salmon. We will then collectively ask whether the marginal benefit of any dam modifications is worth the costs.

Because this draft report/EIS looks so narrowly at dam passage issues, it is difficult for any reader to provide the broad type of input that this issue really deserves. The Pacific Northwest's salmon resources are affected by a broad array of global, regional and local factors and decisions. It is difficult to separate the large issues such as ocean conditions from the regional issues such as lower Estuary predation or dam passage.

Of the four possible dam-modification alternatives outlined in this report, the most feasible and appropriate is Alternative 3. This Alternative seeks to make major modifications in the juvenile salmon migration pattern, without resorting to the risky and wildly premature Alternative 4. Alternative 3 seeks to collect the highest number of juvenile salmon at Lower Granite Dam and move them collectively around the remaining system of dams for release below Bonneville. This Alternative effectively removes the system of remaining dams from the juvenile salmon survival equation. While certainly not a perfect solution, it is a reasonable one. Each of the two risk-based studies (CRI and PATH) who examined the available information have concluded that it is factors below Bonneville Dam which will "make or break" any salmon run's long-term chances for survival. Alternative 3 almost certainly improves these chances.

Having spoken in favor of an Alternative, our Association also feels compelled to speak out against Alternative 4 – the Dam Breaching Alternative.

Breaching a dam is an irreversible decision which trades major economic dislocations to a large segment of the nation for a "slight to moderate" reduction in extinction risks for Snake River salmon. Rejecting this alternative is even easier when one realizes that its benefits depend upon highly speculative assumptions about mortality, which could easily be wrong. The PATH analysis itself could not determine whether even as drastic a measure as Alternative 4 would be sufficient for salmon recovery.

Alternative 4 is far too big a gamble to take. It makes far more policy sense for our region to take reversible drastic measures before we attempt irreversible drastic measures. The CRI analysis noted that changes in harvest practices alone (a reversible policy option) will reduce fall chinook and steelhead extinction risks to acceptable levels. The CRI analysis also notes that dam breaching alone is unlikely to recover Spring/Summer Chinook unless the breaching is accompanied by major habitat improvements, harvest changes and predator control.

- 1 But these other habitat, harvest and predator factors are beyond the complete control of the Corps of Engineers or even the federal government. Without a regional consensus on a binding plan to control these other factors, it makes no sense to choose Alternative 4. The best information we have shows that even dam breaching will not be sufficient to prevent further population declines of the Spring/Summer Chinook and Steelhead runs.

While the benefits of dam breaching are speculative, however, the impacts are not. The loss of electric generating capacity at a time of increasing energy demand is by itself enough to give any

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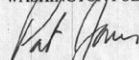
policy-maker pause. But the impacts on the inland northwest's agricultural production and transportation system will be enormous. These costs will be borne disproportionately by rural communities who do not have the financial capacity to enlarge the surface transportation system to make up for the loss of navigation. Federal and state transportation funding are both under extremely high pressure, and we are losing the fight to provide efficient transportation corridors even in our populated and prosperous areas. The funds to make up for a loss of navigation will be nearly impossible to obtain, and a breaching of these dams will lead to a huge loss of agricultural productivity.

In addition to these losses, there are likely to be profound environmental effects from any dam breaching solution. These effects will include a substantial increase in truck traffic along congested highways, habitat impacts from rail and highway widening projects, and the sudden increase in silt load that would result from a breaching action.

Our region needs to do the best it can to recover the Chinook and Steelhead runs of the Lower Snake River. But we cannot destroy the economy of a large region on the bet that it might help if coupled with other factors that we may or may not be able to implement. On this basis, it seems that Alternative 3 is the best choice.

Yours truly,

WASHINGTON PUBLIC PORTS ASSOCIATION



Patrick Jones
Executive Director

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